

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS
LIABILITY LITIGATION

MDL No. 2419
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

All Actions Naming The Saint Thomas
Outpatient Neurosurgical Center

DECLARATION OF STEVEN GASSERT

Steven Gassert declares, under penalty of perjury on the date identified below, as follows:

1. I am the Project Manager for Epiq Systems, Inc. (“Epiq”) overseeing Epiq’s role as escrow agent for the Saint Thomas Settlement Qualified Settlement Fund (the “QSF”).
2. As part of its administration of the QSF, Epiq provides the following services:
1) set up and establish the escrow account with the bank holding the funds; 2) aid in the payment of individual awards to individual claimants by cutting checks and mailing checks to individual claimants; 3) aid in lien clearance and help ensure that claimants have satisfied certain lien obligations prior to payments to individual claimants; and 4) field questions and emails from claimants and claimants’ counsel on status of payment, lien resolution, and administration.
3. Under the terms of its agreement with the Plaintiffs’ Steering Committee (“PSC”) in the above-referenced lawsuit (the “MDL”), Epiq generally charges an hourly fee ranging from \$50-\$200 for services rendered as part of its administration of the QSF. Epiq has also incurred banking, postage, and other expenses that are reimbursed as part of its agreement with the PSC. Epiq catalogues these charges and expenses in monthly invoices it sends to Gerard J. Stranch, IV at Branstetter, Stranch, and Jennings PLLC.
4. On June 30, 2017, Epiq sent an invoice to the PSC for the costs and expenses incurred between June 1, 2017 and June 30, 2017 and requested payment of \$ 8,077.24.

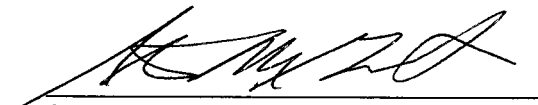
5. On July 31, 2017, Epiq sent an invoice to the PSC for the costs and expenses incurred between July 1, 2017 and July 31, 2017 and requested payment of \$4,177.66.

6. On August 31, 2017, Epiq sent an invoice to the PSC for the costs and expense incurred between August 1, 2017 and August 31, 2017 and requested payment of \$3,479.76.

7. On September 14, 2017, Epiq sent an invoice to the PSC for the costs and expenses to complete its work as the escrow agent for the QSF, and requested payment of \$10,394.34.

8. In total, and through the date indicated on the below declaration, Epiq has sent a total request of payment for \$ 26,129.00. These invoices are for the work and expenses incurred on administering the QSF in Epiq's role as escrow agent for the QSF.

Executed this 18th day of September, 2017 in Portland, Oregon.


Steven Gassert